

**EXHIBIT A TO ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	§ Chapter 11 Case
	§
Old LC, Inc., <i>et al.</i> <sup>1</sup>	§ Case No. 19-11791 (BLS)
	§
Debtors.	§ Jointly Administered

Official Committee of Unsecured Creditors  
of Old LC, Inc., et al., for and on behalf of  
the estates of Old LC, Inc., *et al.*;

*Plaintiff,*

V.

Upfront V, LP, Breakwater Credit Opportunities Fund, L.P.; Upfront GP V, LLC; Mark Suster; Dana Kibler; Gregory Bettinelli; Saif Mansour; Aamir Amdani; Eric Beckman; Darrick Geant; and Joseph Kaczorowski

*Defendants.*

## JOINT STIPULATION EXTENDING TIME TO RESPOND TO FIRST AMENDED COMPLAINT

Plaintiff Official Committee of Unsecured Creditors (the “***Plaintiff***” or “***Committee***”) of Old LC, Inc.; Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. (collectively, “***Loot Crate***” or the “***Debtors***”), and Defendants Upfront V, LP, Breakwater Credit Opportunities Fund, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler, Gregory Bettinelli, Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (collectively, the

<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309.

“**Defendants**,” and collectively with the Committee, the “**Parties**”) file this *Joint Stipulation Extending Time to Answer*, and hereby stipulate and agree as follows:

1. The Committee filed its *Complaint and Objection to Claims* (the “**Complaint**”) on November 2, 2020 [D.I. 1].

2. On November 24, 2020, the Court entered the *Order Approving Scheduling Order* [D.I. 19] that, among other things, set January 15, 2021 as the deadline for the Defendants to answer and/or otherwise respond to the Complaint.

3. On January 15, 2021, defendants Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli (collectively, the “**Upfront Defendants**”) filed their *Motion to Dismiss* [D.I. 24].

4. On January 15, 2021, defendants Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (collectively, the “**Breakwater Defendants**”) filed their *Answer and Specific Defenses* [D.I. 25].

5. On February 5, 2021, Plaintiff filed the *First Amended Complaint and Objection to Claims* [D.I. 28] (the “**First Amended Complaint**”).

6. The Parties agree that the Upfront Defendants’ Motion to Dismiss [D.I. 24] is now moot in light of the First Amended Complaint.

7. The Parties agree that the time within which Defendants may answer, move, or otherwise plead to the First Amended Complaint in the above-referenced adversary proceeding is hereby extended to and including **March 5, 2021**, with Defendants reserving all available rights, remedies and defenses.

8. If Defendants file one or more motions pursuant to Fed. R. Bankr. P. 7012 and/or Fed. R. Civ. P. 12, the Plaintiff shall file any opposition to the motions on or before **March 26, 2021**.

9. If applicable, Defendants shall file any reply in support of any motions on or before **April 9, 2021**.

10. This stipulation is without prejudice to an application for, or stipulation to, a further extension of the response deadlines set forth herein. Any other deadlines not affected by this Stipulation remain unchanged.

Dated: February 19, 2021  
Wilmington, Delaware

Respectfully submitted,

**MORRIS JAMES LLP**

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